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HAND DELIVERY

January 8, 2010

Marchant Schneider
Planner
Department of Planning
1 Harrison St. SE 3rd Floor
Leesburg, VA 20177



Dear Marchant:

I am pleased to present the second submission for Highway 50 Real Estate LLCs Hospital and Outpatient Medical Care Facility Special Exception Application, SPEX 2007-0021. Although the name of the center and its orientation have changed, the application remains largely the same. Enclosed you will find the following:

- 15 copies of the comment response letter responding to staff's initial round of comments
- 15 copies of the updated Statement of Justification
- 15 copies of the Traffic and Trip Generation Assessment from Gorove/Slade showing that the hospital will generate fewer trips than an equivalent square footage of approved office uses
- 15 copies of the updated Special Exception Plat, five of which include color renderings of the hospital
- A CD containing electronic copies of the above-listed items

Please let me know if there is any additional information you need to facilitate staff's review.

Sincerely,


Molly M. Novotny



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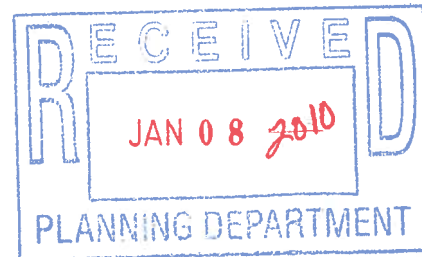
Tracey White, HCA Capital Division
Bryan Seely, HCA, Nashville
Mark C. Looney, Cooley Godward Kronish LLP
Matthew Nitch, Earl Swensson Associates, Inc
Eric Siegel, Urban
Josh Orndorff, Urban
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January 8, 2010

Mr. Marchant Schneider
Planner
Department of Planning
1 Harrison Street, SE 3rd Floor
Leesburg, VA 20177



**RE: SPEX 2007-0021, Route 50 (HCA) Medical Campus
Response to First Referral Comments**

Dear Marchant:

This letter constitutes our responses to the initial staff and agency comments that we received in the fall of 2007, before we put the above-referenced application on hold. As you know, we have re-activated the application and, although we have made some changes to the design of the medical campus, the original comments remain relevant and are addressed in this comment response letter. In addition, we have updated the application to be consistent with the approvals of ZMAP 2006-0007 and SPEX 2007-0037, both of which were approved on December 4, 2007. The other significant changes that are part of this application are:

- The heliport that was originally included as a component of this application was approved by SPEX 2007-0037. Therefore, it is no longer part of this application and is labeled on the plat as "approved".
- The hospital's orientation has shifted from Rt. 50 to Stone Springs Boulevard.

Each staff/agency review comment is summarized in italics below, followed immediately by our response.

Virginia Department of Transportation (comments dated September 21, 2007)

1. *Please provide draft approval conditions to this office for review.*

Response: The Applicant is drafting development conditions that will be submitted under separate cover.

2. *Approval of this application is contingent upon the approval of ZMAP 2006-0007 Glascock Field at Stone Ridge.*

Response: Comment acknowledged. The Loudoun County Board of Supervisors approved ZMAP 2006-0007 and SPEX 2007-0037 on December 4, 2007.

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3. *Applicant should dedicate right of way and construct Route 50 frontage improvements consistent with one-half of the ultimate typical section (R6M) as specified in the Loudoun Countywide Transportation Plan (CTP).*

Response: The Applicant agreed to this dedication of right-of-way and improvement to Route 50 along the Property's frontage through Proffer IV.A.1 in ZMAP 2006-0007 and has shown the improvement on the SPEX Plat. In addition, CPAP 2006-0152, which Loudoun has already approved, shows the frontage improvements. The improvements will be constructed as required by ZMAP 2006-0007 and CPAP 2006-0152.

4. *Improvements at the Route 50 intersections of Stone Springs Boulevard Extended and Road B are to be made by this applicant such that the intersections operate at acceptable levels of service (LOS).*

Response: Proffers IV.A.2 and IV.C.1 in ZMAP 2006-0007 require the construction of both Stone Springs Boulevard and Road B in advance of the proposed hospital, and the SPEX Plat shows the right of way reservation and lane configuration for those roads. Furthermore, CPAP 2006-0152, which shows the improvements at Route 50 and Stone Springs Boulevard, has already been approved by Loudoun County. Once constructed, these roads will operate as approved with ZMAP 2006-0007.

5. *The applicant should provide a pro-rata monetary contribution to be applied toward area transportation improvements.*

Response: The Applicant will provide its regional road contribution in accordance with ZMAP 2006-0007 Proffer IV.G.2. That proffer calls for a contribution of \$0.60 per square foot for non-residential uses and an additional \$0.60 (total \$1.20 contribution) per square foot for medical office development.

6. *The applicant should proffer specific transportation improvements as identified on pp. 42 – 46 of the Traffic Impact Study (TIA) titled "Glascock Field at Stone Ridge" by Wells & Associates, LLC dated March 10, 2006.*

Response: Proffers IV.A through IV.L in ZMAP 2006-0007 include commitments to address the specific transportation improvements identified within the "Glascock Field at Stone Ridge" traffic study.

7. *Related to comment # 6: The applicant should construct the transportation improvements specified in the background conditions of the TIA.*

Response: The Applicant respectfully points out that the background conditions would require transportation improvements without this project. The proposed hospital use reduces the total number of expected peak-hour trips in comparison to the approved, by-right office uses. Therefore, there is no rational nexus to require the Applicant to mitigate existing conditions. Further, the County can use proffered regional road contributions associated with ZMAP 2006-0007 toward transportation improvements specified in the background conditions.

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8. *Has the design been submitted/approved for the ultimate planned interchange at Route 50/West Spine Road?*

Response: West Spine Road is not adjacent to Land Bay 2, which is the parcel on which the special exception is requested. It is our understanding that the Applicant of the approved Gum Spring Center development on the south side of Route 50 has submitted a conceptual design for that interchange to VDOT.

9. *This applicant should dedicate any necessary right of way and provide monetary contribution toward design/construction of the Route 50/West Spine Road interchange.*

Response: The Route 50/West Spine Road interchange is located off-site and requires no right-of-way dedication from the Property. The County can use regional road contributions proffered with ZMAP 2006-0007 toward the design and construction of that interchange.

10. *Has the design been submitted/approved for the ultimate planned interchange at Route 50/Stone Springs Boulevard?*

Response: CPAP 2006-0152, which is approved, details the design of the planned intersection that was proffered as part of ZMAP 2006-0007. The SPEX Plat shows that intersection commitment, while also reserving the right of way for a future compact, urban diamond interchange, should such an interchange be adopted into the Countywide Transportation Plan at a later date.

11. *Related to comment # 10: This applicant should dedicate any necessary right of way and provide monetary contribution toward design/construction of the cited interchange.*

Response: The Applicant committed to the dedication of right of way for the Route 50/Stone Springs Boulevard interchange in ZMAP 2006-0007 and has illustrated the necessary right-of-way to construct a compact, urban diamond interchange on the SPEX plat. The Applicant, through the ZMAP, pledged \$0.60 per square foot of non-residential and \$1.20 per square foot of medical office buildings, that can be used on such regional improvements as this intersection.

12. *Gum Spring Road, Route 659 should not be abandoned or terminated until an adequate replacement facility is in place.*

Response: An adequate replacement for the portion of Gum Spring Road between future Route 50 N. Collector Road and future Road A is required prior to the issuance of the first zoning permit on the Property, as specified in the ZMAP 2006-0007 proffers.

13. *All costs associated with traffic signals (or signal modifications) warranted by this development are to be the responsibility of the applicant including warrant analyses, design and installation of any signals warranted at this site's entrances and/or contiguous intersections.*

Response: Comment acknowledged. This issue was addressed by Proffer IV.F associated with ZMAP 2006-0007.

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14. *Applicant should provide exclusive turn lanes into all site entrances.*

Response: The roads surrounding the Property were designed and committed to by the proffers associated with the underlying zoning. This application is carrying out those proffer commitments and has shown the required four-lane, divided section of Stone Springs Boulevard, including turn lanes, as well as the required four-lane, undivided section of Road B, inclusive of turn lanes. The approved road network therefore includes exclusive left and right turn lanes off of Stone Springs Boulevard into the Property as well as two exclusive left turn lanes and one exclusive right turn lane from Road B.

15. *Is the northernmost entrance located within the influence area of the Stone Springs Boulevard Extended/Future Road B intersection? If so, the entrance should be relocated so that it will not interfere with intersection operations.*

Response: The Applicant has moved the hospital's northernmost entrance east so it is outside of the intersection's influence area. This change is reflected on the SPEX plat.

16. *It would be helpful to show proposed roadway typical sections on the plan.*

Response: Comment acknowledged. Roadway sections for the future Stone Springs Boulevard are shown on approved CPAP 2006-0152. Other road sections will be shown on the appropriate CPAPs.

Community Planning (comments dated October 22, 2007)

1. *Staff recommends the application be amended to include information on geographic characteristics of the area to be served, including the area's population, highway facilities, and transportation. In addition, the application should ensure compatibility with and impact on surrounding uses, such as residential neighborhoods. The application should also ensure there is sufficient acreage for future expansion and what sort of impact this expansion would have in the vicinity of the project.*

Response: The Applicant has made an early commitment to implement the recommendations of the Countywide Healthcare Facilities Policies, which includes a hospital for the Route 50 corridor. An important aspect of the Countywide Healthcare Facilities Policies is the emphasis on expanded healthcare facilities in the Dulles South area of the County to meet the existing and future healthcare needs of the residents in this area of the County. To that end, the Applicant purchased the 24-acre property in December 2006. Construction of a phased medical campus to meet the healthcare demands for this under served area is a significant County priority that the Applicant will implement.

The primary "service area" for the proposed Route 50 Medical Campus includes parts of Western Fairfax County, Loudoun County west of the Fairfax County line, and portions of northern Prince William County. As the road network is completed (i.e., Stone Springs Boulevard, Route 50 North Collector Road, and Route 659 Relocated), additional residential communities will be included in the primary service area.

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The Property is surrounded by the following uses: non-residential zoning (PD-GI and CLI) on the south side of Route 50; residential zoning (R-16) for multi-family residential and existing non-residential (CLI) on the opposite side of existing Gum Spring Road to the east; non-residential (PD-OP) for office on the opposite of future Stone Springs Boulevard to the west; and non-residential zoning (PD-OP) for office to the north on the opposite side of Road "B".

2. *Staff recommends the applicant delineate all stream corridor resources, including the 50-foot management buffer adjacent to the floodplain.*

Response: The management buffer was depicted on the CDP associated with ZMAP 2006-0007 and explained in Proffer VI.F of the same application. It is also depicted on the SPEX Plat and labeled "Variable Width Management Buffer". In addition, all existing floodplains are labeled on the plan set.

3. *Staff recommends the wetlands on site be preserved to the greatest extent possible. If disturbance of some wetlands cannot be avoided, staff recommends they be mitigated on-site or within the impacted policy area.*

Response: This issue was addressed in Proffer VI.B associated with ZMAP 2006-0007.

4. *Although no tree save areas are proposed on this application, staff recommends that the applicant look into potential areas on-site where natural vegetation could be saved to supplement and enhance the site's landscaping.*

Response: Existing vegetation along Route 50 has been incorporated into the Type 5 Buffer Yard and BMP facility for the Property. However, it's important to note that VDOT may need to remove trees from these areas, or remove entire areas, to allow the construction of the Stone Springs Boulevard/Route 50 interchange. Therefore, there is limited to no potential for permanent tree conservation on site. Proffer VI.C with ZMAP 2006-0007 requires tree conservation elsewhere on the property, subject to the rezoning.

5. *If development is not relocated to an area outside of the river and stream corridor resource, staff recommends the areas proposed to be impacted be surveyed.*

Response: The Applicant notes that a Phase I Survey was submitted with the initial application. No further work was recommended on the Property.

6. *Staff recommends the use of acoustical treatment for the hospital to ensure that interior noise levels do not exceed a sound level of 45 db(A).*

Response: The hospital rooms will be designed to comply with the County's interior noise standards as required by the Zoning Ordinance.

7. *Staff recommends that the application carefully consider the impact of noise generated from the helicopter traveling over nearby residences. Staff recommends the application ensure the helicopter associated with the helistop will not create a disturbance to residential uses*

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adjacent to the subject site. In addition, staff encourages the applicant to demonstrate coordination with the Federal Aviation Administration (FAA).

Response: The heliport was approved under SPEX 2007-0037 and is shown as existing on this application.

8. *Staff requests information pertaining to traffic noise levels be submitted to the Office of Transportation Services for review.*

Response: Per Comment 6 above, the Applicant will design the buildings to comply with the County's interior noise standards. Traffic noise levels will be buffered by setbacks and buffers.

9. *Staff supports the incorporation of the Route 50 Corridor Design Guidelines into the Proffer Statement. However, for the purpose of this special exception application, staff requires more detail as to the proposed building design, loading areas, lighting, signage, and usable outdoor spaces for this application along with commitments to ensure compliance with the Plan policies.*

Response: The Applicant has included an illustrative building rendering with this submission that shows the planned hospital and medical office building, which are connected by an interior corridor. Loading areas are shown on the SPEX Plat for both uses. Lighting and signage will comply with Zoning Ordinance requirements at time of site plan submission.

10. *Staff recommends revising the SPEX plat to clearly depict bicycle and pedestrian access both to the site and internal to the site. Bicycle and pedestrian access should be provided along Route 50 and Gum Spring Road. Pedestrian pathways with plantings should be provided from the parking area to the buildings. Staff also recommends including a sufficient number of bicycle racks in support of non-vehicular modes of transportation to this project. Staff further recommends the applicant consider the provision of showers, clothing lockers, and changing rooms.*

Response: A 10-foot wide multi-use trail is shown along the Property's Rt. 50 frontage, which connects to sidewalks along the Property's perimeter and internal to the site. Per ZMAP 2006-0007, sidewalks and crosswalks are provided throughout the Property to ensure safe pedestrian pathways from the parking areas to the buildings. Bicycle racks will be provided on site, with the locations to be determined at time of site plan, and a locker room with showers will be available to hospital employees.

11. *Staff recommends that lighting be fully shielded to reduce glare and light trespass. This includes lighting of the parking areas, and lighting related to signage along Route 50.*

Response: Comment acknowledged. This has been addressed by Proffer III.B of ZMAP 2006-0007.

Environmental Review (comments dated October 5, 2007)

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1. *The Army Corps of Engineers issued Jurisdictional Determination #06-B0037 on March 21, 2006, confirming a wetland delineation performed by Wetland Studies and Solutions for the project. Please provide a note on Sheet 1 referencing the approved Jurisdictional Determination as the source of the wetlands information depicted on the plan (e.g., Jurisdictional waters and wetlands depicted on the plan were delineated by Wetlands Studies and Solutions and confirmed by Army Corps of Engineers Jurisdictional Determination #06-B0037, issued on March 21, 2006).*

Response: A note has been added to Sheet 1 of the SPEX Plat to reference the Jurisdictional Determination number, date and consultant information.

2. *Impacts are proposed to all jurisdictional waters and wetlands on the property, totaling approximately 0.3 acres. Staff emphasizes the importance of mitigating wetland and stream impacts close to the impact area to help maintain water quality and flood protection functions, as well as habitat. Therefore, where such impacts are deemed unavoidable, staff recommends a commitment be provided to prioritize the mitigation as follows: 1) within the Broad Run Watershed within the same Loudoun County geographic Policy Area, 2) within the Broad Run Watershed within another Loudoun County geographic Policy Area, or 3) elsewhere within Loudoun County, subject to approval by the U.S. Army Corps of Engineers and the Virginia Department of Environmental Quality. This approach is consistent with Policy 23 on Page 5-11 of the RGP, which states that "the County will support the federal goal of no net loss to wetlands in the County." Furthermore, the County's strategy is to protect its existing green infrastructure elements and to recapture elements where possible [RGP, Page 6-8, Green Infrastructure Text].*

Response: This issue was addressed by Proffer VI.B in ZMAP 2006-0007. That proffer pledges to mitigate wetland impacts onsite first before looking to other wetland sites within Loudoun County or within the Potomac River watershed.

3. *Staff recommends that existing vegetation located within the setback from Route 50 be preserved within a Tree Conservation Area and that the applicant provide a commitment incorporating the suggested Tree Conservation Area language approved by the County Urban Forester. Staff further recommends that the applicant consult with the project arborist regarding the removal of Virginia Pine from this area.*

Response: Potential tree conservation areas along Route 50 are located within the required Type 5 Buffer Yard and BMP facility for the Property. However, it's important to note that VDOT may need to remove trees from these areas for the construction of the ultimate Stone Springs Boulevard/Route 50 interchange. Therefore, there is limited to no potential for permanent tree conservation on the property. Proffer VI.C with ZMAP 2006-0007 requires tree conservation elsewhere on the Glascock property.

4. *One Stormwater Management (SWM)/Best Management Practice (BMP) facility (a dry pond) is depicted in the southwest corner of the site. While approximately half of the site drains toward the planned facility, the other half of the site drains into a forested wetland on the adjacent property that is being preserved in conjunction with the Glascock Field at Stone Ridge application (ZMAP-2006-0007). The Surface Water Policies within the RGP support the*

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implementation of Low-Impact Development (LID) techniques (Page 5-17). Therefore, staff encourages the applicant to honor existing drainage divides and maintain hydrology to the offsite forested wetland by providing SWM/BMP facilities in the northern portion of the site, in addition to the facility currently shown. Staff further recommends that the dry pond currently proposed be converted to a wet pond to improve pollutant removal. SWM/BMP facilities located within the 100-foot Buffer Yard adjacent to Route 50 are required to have a "permanent aqueous element," as outlined in Section 5-1414B(5) of the Revised 1993 Zoning Ordinance.

Response: During the processing of ZMAP 2006-0007, it was determined that adequate outfall exists to drain the Property into the forested wetlands on the adjacent property and the proposed SWM/BMP pond will provide adequate water quality to improve pollutant removal; therefore, there was no need for LID techniques. Further, the Applicant has reserved an area along Route 50 to provide an aqueous element to assist in the mitigation of impacts. The Applicant will provide the SWM/BMP pond and/or reserved aqueous area in accordance with FSM and Zoning Ordinance standards.

5. *Given the proposed hospital use and the need for overnight accommodations similar to residential uses, the proximity of the proposed hospital to Route 50 (a planned Principal Arterial), and the location of the proposed facility within the Ldn 60 airport noise buffer, staff recommends that a commitment be provided to perform a traffic noise study and a building shell analysis prior to occupancy to ensure that interior noise levels do not exceed 45 decibels consistent with the Noise Policies of the Revised Countywide Transportation Plan (Page 4-7) and the Airport Noise Policies of the Revised General Plan (Page 5-46). Sample commitment language is provided as an attachment to this referral.*

Response: The Applicant will agree to a condition of approval to provide acoustical treatment to achieve an interior noise level of 55 dBA for the hospital.

6. *Staff encourages a commitment in the design of the proposed hospital to Leadership in Energy and Environmental Design (LEED) standards, as supported by the United States Green Building Council. LEED recognizes site sustainability, conservation of energy and water, and indoor air quality, among other goals. The Revised General Plan also encourages these goals in the General Water Policies supporting long-term water conservation (Policy 1, Page 2-20); the Solid Waste Management Policies supporting waste reduction, reuse, and recycling (Policy 2, Page 2-23); and the Air Quality Policies supporting the creation of pedestrian and bicycle facilities (Policy 1, Page 5-41). Furthermore, the County encourages project designs that ensure long-term sustainability, as discussed in the Suburban Policy Area, Land Use and Pattern Design text (Page 6-2).*

Response: The Applicant has a history of incorporating green design standards into its hospitals and is working to incorporate many of those features at StoneSpring, such as commissioning all of the building's systems to determine their efficiency, using high-efficiency lighting fixtures and water-conserving sinks and toilets, installing energy star appliance products, landscaping with indigenous plants and using interior products with little or no VOCs or PVCs. As the design becomes more finalized, the Applicant will be able to highlight more and more of its green building practices.

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Health Department (comments dated September 11, 2007)

1. *All the proposed structures are properly served by public water and public sewer.*

Response: Comment acknowledged.

2. *If any wells and drainfields are encountered, they must be properly abandoned (Health Department permit required).*

Response: Comment acknowledged.

Office of Transportation Services (comments dated September 13, 2007)

1. *Applicant needs to provide a revised traffic analysis that reflects the amount and type of overall development proposed on the site and that accurately compares trip generation between future by-right uses and proposed SPEX uses. OTS staff notes that a trip generation comparison was only accepted for this project if trips from the SPEX uses were less than the trips from the PD-OP by-right uses. A meeting with the Applicant needs to be held to discuss the components of the revised traffic analysis, including the issue of "general office" versus "medical office" uses. The revised analysis may need to be expanded to include information on peak hours and projected levels of service on the road network surrounding the medical campus as volumes and peak hours may be different from those analyzed (general office) in the traffic study for the larger Glascock Field rezoning. As the Glascock Field rezoning is still pending, any change in that application should be reflected in the revised traffic analysis for this special exception.*

Response: Proffers IV.G and IV.H associated with ZMAP 2006-0007 addressed the different trip characteristics and impacts of medical office versus general office. The hospital proposed in this application generates fewer trips than an equivalent-sized office or medical office use. Attachment 1 is a memorandum prepared by Gorove/Slade Associates, dated January 8, 2010, that presents a trip generation comparison between the proposed hospital and approved office use. The comparison evaluates the worst-case scenario by comparing trips generated by the hospital with the trips generated by the general office (general office generates less trips than a similar sized medical office). The comparison reveals that the hospital will generate 62 percent fewer AM peak hour trips and 53 percent fewer PM peak hour trips as compared to the approved general office.

2. *The Applicant should clarify the amount and type of proposed SPEX uses within the limits of the special exception area. For example, the plat indicates that the maximum amount of proposed SPEX uses would be no greater than 247,000 sq. ft., but this amount does not correspond with other amounts in the Applicant's materials, which indicate that the hospital would consist of approximately 200,000 sq. ft. and the outpatient medical care uses would be up to 55,500 sq. ft. Proposed development amounts contained in the traffic analysis, in the statement of justification, and on the SPEX plat should all be consistent with one another.*

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Response: The Plat has been revised to state that up to 461,967 square feet of special exception uses are planned as well as an additional nearly 145,000 square feet of by-right uses for a total of up to 606,914 square feet of development on the subject Property, all of which is consistent with ZMAP 2006-0007. The traffic memo submitted with this package analyzes the impact of replacing 337,000 square feet of office with the proposed hospital; it does not re-analyze the entire development because, as stated in Comment 1 above, ZMAP 2006-0007 accounted for trips associated with the full development.

3. *The need for any additional turn lanes at any of the four entrances into the site should be evaluated as part of the larger Glascock Field rezoning and provided, if necessary, as part of the rezoning's proposed road improvements. These additional improvements may be needed given the potential for significantly higher trip generation rates than were previously anticipated as by-right medical office uses were not accounted for in either traffic analysis (ZMAP or SPEX). Regarding traffic signals, a condition of approval should be included requiring the installation of signals by the Applicant at any of the site entrances if warranted.*

Response: Turn lanes are provided and are shown on the SPEX Plat at each of the four entrances to the Property. With respect to traffic signals, Proffer IV.F of ZMAP 2006-0007, commits the Applicant to install a signal at the intersection of Road A and Road B if warranted. Further, the Applicant agreed to a regional road contribution in accordance with Proffer IV.G.2 of ZMAP 2006-0007 that calls for a contribution of \$0.60 per square foot for non-residential uses and an additional \$0.60 (total \$1.20 contribution) per square foot for medical office uses, money that could be used for any number of transportation improvements proximate to the site.

4. *The Applicant should include within the SPEX plat a pedestrian circulation plan for the entire 24-acre site. This plan should depict sidewalks internal to the parking areas and between proposed buildings as well as sidewalks/multi-use trails along Stone Springs Boulevard Extended and Road "B". Staff does not believe that a multi-use trail along Route 50 is necessary or appropriate given the plan to convert Route 50 to a limited access facility in the future.*

Response: Comment acknowledged. The SPEX Plat has been revised to depict sidewalks and crosswalks throughout the Property. Further, the Applicant notes that OTS staff had no issue with a multi-use trail along Route 50 as shown on the approved CDP for ZMAP 2006-0007, which is a required element of that approval.

5. *The Applicant should coordinate with OTS staff regarding the locations and other specifics of future bus stops on site; staff is available to meet regarding this topic. OTS staff recommends that bus stops be located proximate to the entrances of both the proposed hospital and medical office buildings on site in order to provide bus riders with safe and convenient access to the medical facilities. A condition of approval should be included requiring the Applicant to install a concrete pad, bus shelter/canopy, lighting, and related signage at each bus stop prior to occupancy of any of the proposed uses, and requiring the Applicant to maintain these bus stop facilities in perpetuity.*

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Response: The Applicant will include a development condition that requires the installation of a bus stop upon initiation of intra-County bus service to the site on a frequent basis.

6. *Staff notes that any of the regional transportation and transit cash contributions for non-residential uses proposed as part of the Glascock Field rezoning application would also apply to the proposed hospital and outpatient medical care SPEX uses.*

Response: Comment acknowledged.

7. *The proposal to reconfigure the Gum Spring Road (Road "B")/Route 50 intersection to maintain right-in/right-out movements (by removing the existing signal and median crossover) is not consistent with the Revised CTP, which calls for the ultimate condition of this segment of Route 50 to be a limited access facility with grade-separated interchanges at various locations, including the West Spine Road (approximately 1,000 feet to the east of the proposed right-in/right-out movement). The proposed right-in/right-out configuration is not only inconsistent with the limited access policy but would also result in weave/merge conflicts with the future Route 50/West Spine Road interchange. It is also inconsistent with policies contained in the Arcola Area/Route 50 CPAM approved in 2006. Staff recommends that the intersection be closed in its entirety, with alternate access provided via Road "B" north to Road "A" and Stone Springs Boulevard Extended. However, given that the location of the existing intersection is part of an existing public roadway, final authority on the reconfiguration or closure of the intersection rests with VDOT. Further discussion and coordination on this matter with VDOT is necessary.*

Response: The Applicant discussed and addressed this issue during the processing of ZMAP 2006-0007. Proffer IV.L associated with ZMAP 2006-0007 acknowledges that the Gum Spring Road/Route 50 intersection may be closed in the future.

CIO Planning (comments dated November 8, 2007)

1. *Staff concurs with the finding of the report and agrees that no further archaeological field work is warranted on this property.*

Response: Comment acknowledged and appreciated.

2. *Staff recommends, as a means of mitigating the loss of the historically significant Glascock Landing Field (053-6090), that signage commemorating the location of the resource and its significance to Loudoun's history be erected on the project area. Photos of the airfield in its heyday and a brief history would be an appropriate addition to a memorial of this important site.*

Response: The Applicant will provide photographs and historical references regarding the Glascock airfield within the lobby of the hospital.

Parks and Recreation (comments dated November 13, 2007)

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1. *PRCS has reviewed the referenced application, and based on the information provided, PRCS would offer a favorable recommendation. Staff notes that the Application is in accordance with the Countywide Health Care Facilities Policies of the Revised General Plan to provide services in the Route 50 corridor. However, Staff recognizes that this project is in close proximity to a very similar proposal, INOVA Dulles South Hospital (SPEX 2006-0012). Therefore, PRCS defers all policy and planning comments to Community Planning, as the two competing proposals would most likely not be viable in this corridor.*

Response: Comment acknowledged.

Zoning Administration (comments dated November 20, 2007)

1. *The approval of this application is contingent upon the approval of the active rezoning ZMAP-2006-0007 which proposes to rezone the subject portion of the parcel to Planned Development – Office Park (PD-OP). If approved, proffers and conditions of approval associated with this rezoning application may need to be addressed with future submissions of this application for Special Exception.*

Response: Comment acknowledged. The Loudoun County Board of Supervisors approved ZMAP 2006-0007 and SPEX 2007-0037 on December 4, 2007.

2. *The approval of this application will not occur until after December 3, 2007. The amendments to the zoning ordinance which the Board of Supervisors approved with ZOAM-2006-0003 will be in effect December 3, 2007. Submissions of this application submitted after that date will need to be in conformance with all changes associated with this amendment.*

Response: Comment acknowledged.

3. *The Applicant has listed the proposed uses as hospital, medical care facility, outpatient only and a helistop, uses which are permitted by Special Exception in the PD-OP zoning district. Please be advised that the zoning ordinance does have different definitions for helistop versus a heliport. The Applicant has proposed a helistop, which the ordinance defines as, "An area designed to accommodate touch-down and lift-off of helicopters for the purpose of picking up and discharging passengers or cargo. Such an area shall contain no operation facilities other than one (1) tie-down space and such additional facilities as are required by law, ordinance or regulation." The ordinance defines heliport as, "An area, either at ground level or elevated on a structure, licensed or approved for the landing and takeoff of helicopters and which may include auxiliary facilities such as parking, waiting room, fueling and maintenance equipment." Please verify that helistop is the correct use being requested.*

Response: The heliport was approved by SPEX 2007-0037 and is no longer part of this application.

4. *This section states that the Applicant is filing this SPEX application so that the Applicant's use can be considered and reviewed in coordination with ZMAP-2006-0007;*

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however the pending rezoning is scheduled for the November 13, 2007, Public Hearing. While the approval of this application is dependant upon approval of the rezoning, this application is not being reviewed in coordination or conjunction with the rezoning. The Applicant may wish to revise this portion of the Statement of Justification.

Response: Comment acknowledged. ZMAP 2006-0007 was approved in 2007, which established the zoning necessary for this special exception request.

5i. The Applicant has stated that the medical care facility, outpatient only will not exceed 55,000 square feet whether it is located within the hospital or as part of the proposed office building located on the Property. Staff suggests that this become a Condition of Approval for the Special Exception.

Response: The Applicant has committed to a maximum size of the Special Exception uses on Sheet 1 of the Plat and will reiterate that commitment in the Conditions.

5ii. The Applicant has stated that in future phases there is an option for structured parking. Please indicate on the Special Exception plat the possible areas in which the structured parking will be located.

Response: The Applicant has shown a location for a possible future parking garage on the SPEX Plat.

6i. The Applicant has indicated that an extensive system of internal sidewalks, crosswalks and external trails are proposed to assist in pedestrian circulation on the Property. Please indicate and label the pedestrian circulation on the Special Exception plat. In particular, staff questions the proposed access from the Emergency Room to the helistop. There appears to be no clear access or crosswalks regarding access to the helistop.

Response: The Applicant has revised the SPEX Plat to depict sidewalks, crosswalks, and access from the Emergency Room to the heliport.

6ii. The Applicant references a central green to be located at the front door of the hospital. Please label this proposed civic area as such on the Special Exception plat. In addition, a similar area appears to be proposed for the rear access, assumed to be the Emergency Room access. The Applicant has not labeled or addressed the use of this area.

Response: The Applicant has labeled the central green on the SPEX Plat.

6iii. Signage has been mentioned and is stated to be designed consistent with the applicable Zoning Ordinance provisions. Please be advised that signage is not permitted above the roofline of the building. Sheet 5 (Architectural Illustrations) shows a proposed sign which appears to be above the roofline of the building.

Response: Comment acknowledged. The rendering of the Hospital is for illustrative purposes

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only. The Applicant will comply with the Zoning Ordinance requirements for signage on the Property.

7. *The Applicant states that the location of this use on the Property will promote enhanced access to health care services as the County's population and employment base continue to grow, particularly along Route 50. Staff questions if the population in the area is such to support two hospitals less than 1 mile in proximity to each other. SPEX-2006-0012, INOVA Health Care Campus has proposed a hospital, medical and professional office as well as a helistop on a parcel less than 1 mile away on Route 50.*

Response: The Applicant applied for and received a Certificate of Public Need from the State Health Commissioner, who is legally responsible for determining the need for hospitals and other medical facilities and their locations. During this review, the Health Commissioner evaluated and considered the Applicant's proposal against criteria such as population, access, and other criteria and determined that the application should be approved. This need for state approval, ensures that an area is properly served by medical facilities and not over-saturated, as the comment suggests. Inova has not received a similar approval, which is required before a hospital can be established, independent of whether local land use decisions permit a facility.

8. *Whether the level and impact of any noise emanating from the site, including that generated by the proposed use, negatively impacts the uses in the immediate area. The applicant has addressed the residential uses surrounding the proposed use, however the section refers to all "uses" surrounding the proposed use. Please address the noise regarding abutting residential and nonresidential uses. In addition, the Applicant has not addressed the proposed Powerhouse, which is proposed to be located closer to the planned R-16 district than the hospital and helistop. Please address the noise of the Powerhouse and necessary mitigation. The Applicant may wish to locate the Powerhouse farther away from the planned residential uses.*

Response: The powerhouse is an enclosed structure that is located approximately 580 feet from the nearest residential and non-residential use. It will be designed and buffered to comply with Loudoun County noise standards as stated in the Zoning Ordinance.

9. *Whether the glare of light that may be generated by the proposed use negatively impacts uses in the immediate area. The applicant will need to address lighting of the helistop as well. Lighting conditions should also be addressed as a condition of approval for the Special Exception.*

Response: The Applicant will propose a development condition that requires all outdoor lighting associated with the Special Exception uses to be installed so as to preclude light trespass onto adjoining properties, glare to passersby, sky glow, and deterioration of the nighttime environment. The heliport was approved with SPEX 2007-0037 and therefore has been removed from this application.

10. *The applicant has stated that the proposed use will be compatible with uses on adjacent*

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parcels. INOVA has proposed a hospital along Route 50 less than one mile from this proposed location with SPEX-2006-0012, INOVA Health Care Campus. Staff again questions if two hospitals located less than 1 mile from each other along Route 50 will be supported by the surrounding population.

Response: See Applicant's answer to Comment 7 above.

11. The applicant has identified wetland areas on the subject property. Where these areas are impacted, the applicant must comply with the requirements of the U.S. Army Corps of Engineers. Staff defers to the Environmental Review Team for further comment on the impact to existing animal habitat, vegetation, water quality or air quality.

Response: Comment acknowledged. The Environmental Review Team has noted no concern about any impact to habitat, vegetation or water or air quality. Also, please note that the Applicant has addressed the issue of water quality with the proposed BMP/SWM pond and reserve aqueous area along Route 50.

12. Whether the proposed use will affect the structural capacity of the soils. According to County records, the property contains approximately 13 acres of hydric soils (type 79A). Staff defers to the Environmental Review Team for further comment regarding to soils.

Response: The Environmental Review Team has noted no issues with the application's impacts on the soils structural capacity.

13. The applicant has stated that signage will be in accordance with Zoning Ordinance Standards. Sheet 5 of the plan submission shows illustrative architectural drawings in which the sign appears to be located on the parapet, above the roofline. Please be advised that signs are not permitted to be located above the roofline.

Response: Comment acknowledged. The rendering of the Hospital is for illustrative purposes and all signs will comply with Loudoun County sign regulations at time of development. That said, the sign has been removed from the Hospital's penthouse.

14. According to County records, the property is within the Ldn 60 and Ldn 65 contours of the AI Overlay District. The vicinity map is labeled as the Ldn 60 1 mile Airport Impact Overlay District. Please ensure that the contours are correctly labeled on all sheets including the vicinity map. Per Section 4-1405, a disclosure statement identifying the AI Overlay District shall be placed on all subdivision plats, site plans and deeds. Staff recommends the applicant implement noise attenuation measures, such as an acoustical treatment in the building, to reduce the impacts of aircraft noise on patients.

Response: The Applicant will design the hospital to comply with the County's interior noise standards as required by the Zoning Ordinance.

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15. *Note 20 states that there are no other overlay districts, yet County records indicate that approximately 2.45 acres in the northwest portion of the property contain minor floodplain, which has been labeled on the vicinity map.*

Response: The Applicant respectfully points out that the County's Weblogis information is inaccurate. An approved floodplain alteration study (FPAL-2007-0016) associated with the construction of Stone Springs Boulevard relocates any and all floodplain off site.

16. *Note 21 addresses the potential for structured parking to be located on the property. Please label possible locations for the structured parking on the Special Exception plat.*

Response: A potential future parking garage has been shown on the SPEX Plat.

17. *Please add a note per Section 4-307(D) that all utility distribution lines shall be placed underground.*

Response: Comment acknowledged. A note has been included on Sheet 1 of the SPEX Plat that commits to undergrounding all utility distribution lines on the Property.

18. *Please be advised that the changes to the Revised 1993 Loudoun County Zoning Ordinance in association with ZOAM-2006-0007 are effective December 3, 2007. These changes to Section 4-300 (PD-OP district regulations) as well as Section 5-900 regarding Access and Setbacks from Specific Roads that will affect the Zoning Tabulations. Subsequent submissions of this application will need to address those changes.*

Response: Comment acknowledged. The SPEX Plat has been revised to reflect the PD-OP zoning district amendments associated with ZOAM 2006-0003.

19. *Parking Tabulations for Hospital Use. Section 5-1100 requires 1 parking space per doctor on staff. The tabulations have indicated 110 doctors, however no parking spaces have been provided. Based on the information provided, the required number of parking spaces will be 1,096 while 1,025 have been provided.*

Response: The Zoning Tabulation on Sheet 1 has been revised to correct the required number of parking spaces.

20. *Parking Tabulations for the Medical office. There is a typographical error in the parking tabulations for this use. The formula shows 3.3 instead of 3.5 in the calculations.*

Response: Comment acknowledged. The Zoning Tabulation on Sheet 1 has been revised to show the correct formula and parking tabulation.

21. *Loading space tabulations indicate that 2 loading spaces are provided for the hospital and 1 loading space is provided for the medical office. The plat indicates that 4 loading spaces have been provided for the hospital and there are no areas labeled as loading spaces for the*

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medical office building.

Response: The Applicant has revised the plat to label the loading spaces for the hospital and the medical office building.

22. *Please show and label the 35' parking setback along future Stone Springs Boulevard.*

Response: ZMOD 1 approved with ZMAP 2006-0007 reduced this setback from 35 feet to 25 feet. The 25-foot setback from Stone Springs Boulevard is shown on the Plat.

23. *Please label the proposed civic or central green spaces.*

Response: The SPEX Plat has been revised to label the proposed central green.

24. *Please label the location of the Emergency Room.*

Response: The SPEX Plat has been revised to identify the location of the Emergency Room entrance.

25. *Please label and address the dashed line squares located in front of the Medical Office building and at the front and rear of the Hospital. What do these areas represent?*

Response: These lines show future expansion areas of the hospital.

26. *Please label walkways and pedestrian access points from the parking areas to the buildings as well as from the hospital to the helistop.*

Response: The SPEX Plat shows pedestrian pathways between the parking areas and the buildings and the hospital and heliport.

27. *Remove the label and outline of the existing Glascock landing field.*

Response: Comment acknowledged. The label and outline have been removed.

28. *Please address the area between the hospital and the medical office buildings – is this area to be an enclosed walkway to connect the two buildings or is it to be an open walkway?*

Response: The area between the medical office building and the hospital is a covered internal corridor.

29. *Architectural Illustrations. Please label which façade is north, south, east or west.*

Response: The facades have been replaced with a building illustrative.



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January 8, 2010

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I hope and trust this letter addresses the various issues raised by Staff. Please contact me if you have any additional questions or need any additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mark C. Looney". The signature is stylized with a large, looping "M" and a long, horizontal stroke at the end.

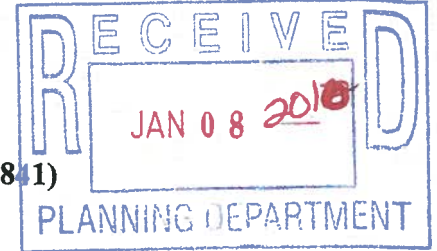
Mark C. Looney

cc: Tracey White, HCA Capital Division
Bryan Seely, HCA, Nashville
Matthew Nitch, Earl Swensson Associates, Inc
Eric Siegel, Urban
Josh Orndorff, Urban
Chris Tacinelli, Gorove/Slade
Tushar Awar, Gorove/Slade
Molly Novotny, Cooley Godward Kronish LLP

343489 v6/RE

**STONESPRING MEDICAL CENTER
SPECIAL EXCEPTION APPLICATION**

**HIGHWAY 50 REAL ESTATE, LLC,
TAX MAP 100, PARCEL 65A (MCPI 204-48-7841)
24597 GUM SPRING ROAD**



**STATEMENT OF JUSTIFICATION
REVISED JANUARY 8, 2010**

I. INTRODUCTION

Highway 50 Real Estate, LLC (the "*Applicant*"), hereby requests approval of a special exception application (the "*SPEX*") to permit the establishment of certain medical uses on approximately 24 acres of land located on the north side of Route 50 commonly referred to as the Glascock Field airstrip and further identified as Loudoun County Tax Map # 204-48-7841, (the "*Property*"). Specifically, the Applicant requests SPEX approval to construct a hospital and outpatient medical care facilities. This proposal is in accordance with the Countywide Health Care Facilities Policies of the Revised General Plan to provide health care services in the Route 50 corridor, as well as the underlying land use designations for the Property.

The StoneSpring Medical Center will be located at a planned new intersection of Stone Springs Boulevard/Relocated Gum Spring Road (Stone Springs Boulevard Extended) and Route 50. Directly south across Route 50 from the Property is the community of Stone Ridge. The Property is located south and west of approved developments of Arcola Center (ZMAP 1998-0004) and Hazout North (ZMAP 1997-0004); it also is centrally-located to serve the health care needs of South Riding, Aldie, Middleburg, Brambleton and other existing and future communities in this portion of Loudoun County.

II. APPROVED REZONING APPLICATION

On December 4, 2007, the Loudoun County Board of Supervisors rezoned 98.56 acres of land from the PD-GI (Planned Development General Industry) and CLI (Commercial Light Industry) zoning districts to the R-16 (Residential) and PD-OP (Planned Development Office Park) zoning districts. The Property subject to this special exception request is part of the land that was rezoned to the PD-OP district that established the underlying zoning for these requested uses. Therefore, the Property, will be developed in accordance with the standards and uses of the Revised 1993 Zoning Ordinance and the approved proffers for ZMAP 2006-0007. A complementary special exception request, SPEX 2007-0037, was approved with the rezoning to permit a heliport on the Property. This Applicant, Highway 50 Real Estate, LLC, was a co-applicant in both those cases.

III. COMPREHENSIVE PLAN COMPLIANCE

The Revised General Plan envisions Loudoun County having a variety of health care facilities in currently under-served areas that otherwise lack direct access to emergency care or facilities. In particular, the Board of Supervisors, through the adoption of the Countywide

Health Care Facilities Plan, placed an emphasis on the distribution of health care services in the County, with particular attention paid to the Dulles South area generally and the Route 50 corridor specifically. The Applicant's plans for the StoneSpring Medical Center acknowledge the Board's direction and offer the County the opportunity for the much-desired health care services along the Route 50 corridor in accordance with the Revised General Plan's guidance.

Beyond the application's fulfillment of the Plan's health care components, the Applicant's SPEX also conforms to the underlying business land use designation for the Property as set forth in the Revised General Plan. By implementing the Plan's vision for the Property, the Applicant will help the County enhance its tax base, add quality jobs and spur economic development, while also offering needed services to the growing population in the Dulles South Area.

IV. PROPOSED STONESPRING MEDICAL CENTER

As part of an initial phase for the StoneSpring Medical Center, the Applicant proposes to construct an approximately 337,000 square foot general acute care hospital along with outpatient medical care facilities on the Property. The total square footage of the special exception uses will not exceed 461,967 square feet and will be located within the hospital itself or as part of office buildings approved for the Property under ZMAP 2006-0007. The hospital is proposed up to five (5) stories in height. Parking will be provided in surface parking spaces, with the option for a structured parking facility as necessary to satisfy zoning ordinance requirements. Substantial landscaping and buffers will be used to screen the planned uses in accordance with the standards of the Revised 1993 Zoning Ordinance.

A. SITE DESIGN AND ACCESS

The Property on which the hospital is to be built is bound by the planned extension of Stone Springs Boulevard to the west, proposed Road "B" of the Glascock rezoning to the north and east, and Route 50 to the south. Stone Springs Boulevard and Road "B" will provide easy access to the hospital for residents along the Route 50 corridor. Stone Springs Boulevard, coupled with the future construction of the Route 50 North Collector Road north of the Property, creates a transportation axis with important connections that will accommodate population growth and associated traffic generated by the continued development along Route 50 as envisioned by the Revised General Plan.

An extensive system of internal sidewalks and crosswalks, and external trails are proposed to assist in pedestrian circulation on the Property. A central green is proposed as the gateway or "front door" of the hospital and is to serve as an aesthetically pleasing civic amenity for employees, patients, and visitors.

The Applicant has included a unified landscaping program and unified treatment of setbacks to establish an aesthetically pleasing vista along Route 50, Stone Springs Boulevard and Road "B" including a Type 5 Front Yard Buffer along Route 50. As shown on the attached exhibits, the hospital makes use of architectural treatments to promote a sense of place and high-

quality building design to attract health care related business users. Signage is to be designed consistent with the applicable Zoning Ordinance provisions.

B. POPULATION GROWTH AND THE NEED FOR A HOSPITAL IN THE DULLES AREA OF LOUDOUN COUNTY

According to the Loudoun County Department of Economic Development, Loudoun County's population will exceed 310,000 residents by 2010 and 415,000 residents by 2020. Under the Revised General Plan, the overwhelming majority of that population growth is to be channeled into the Suburban Policy Area, in which the Property is located. Moreover, the number of employees working in Loudoun County is expected to nearly triple between 2000 and 2020, rising from approximately 87,000 to over 212,000. Thus, the location of this use on the Property will promote enhanced access to health care services as the County's population and employment base continues to grow, particularly along Route 50.

VI. CONCLUSION

The StoneSpring Medical Center will provide the Route 50 corridor with critical healthcare infrastructure, as encouraged by the Health Care Facilities Policies of the Revised General Plan and the Board of Supervisors. The proposal implements the County's vision for a variety of medical facilities and programs to provide comprehensive care and treatment to a burgeoning population along the Route 50 corridor. The road linkages and improvements proposed in ZMAP 2006-0007 and carried out by this Applicant will complement the Route 50 road network and provide better vehicular circulation in this portion of the County. Therefore, the Applicant respectfully requests the support of County Staff and the Planning Commission and ultimate approval of the SPEX application by the Board of Supervisors.

SPECIAL EXCEPTION MATTERS FOR CONSIDERATION
Revised 1993 Zoning Ordinance Section 6-1310

- (A) *Whether the proposed special exception is consistent with the Comprehensive Plan.*

The Planned Land Use Map designates the Property for Business Community. The proposed hospital and outpatient medical care facilities are identified as Institutional uses, which are consistent and complementary to the Business Community policies of the Revised General Plan ("RGP").

Hospital uses and medical outpatient care facilities are also discussed in the Countywide Health Care Facilities policies of the RGP, which identifies Route 50 as a suitable location for both these uses. Therefore, the proposed hospital and outpatient medical care facility uses are consistent and compatible with the Countywide Health Care Facilities policies of the RGP.

- (B) *Whether the proposed special exception will adequately provide for safety from fire hazards and have effective measures of fire control.*

The proposed hospital and outpatient medical care facilities will provide effective measures of fire control that meet all state and local fire safety requirements and regulations.

- (C) *Whether the level and impact of any noise emanating from the site, including that generated by the proposed use, negatively impacts the uses in the immediate area.*

The proposed use for the Property will not generate noise that may negatively impact other proximate uses. The proposed hospital will be located approximately 800 feet away from the nearest residential unit. Additionally, the Applicant will provide a landscaping program to mitigate auditory impacts.

- (D) *Whether the glare or light that may be generated by the proposed use negatively impacts uses in the immediate area.*

All lighting for the proposed hospital and outpatient medical care facilities will be designed to minimize glare on adjacent uses. Lighting shall conform to the applicable sections of the Zoning Ordinance and Facilities Standards Manual.

- (E) *Whether the proposed use is compatible with other existing or proposed uses in the neighborhood, and adjacent parcels.*

The proposed uses were considered with the larger Glascock Field rezoning and are compatible with the adjacent parcels.

- (F) *Whether sufficient existing or proposed landscaping, screening and buffering on the site and in the neighborhood adequately screen surrounding uses*

As recommended by the Route 50 Task Force, the Applicant will provide a unified landscape program, architectural treatments, and setbacks to mitigate visual impacts of the hospital and outpatient medical care facilities from surrounding uses.

- (G) *Whether the proposed special exception will result in the preservation of any topographic or physical, natural, scenic, archeological or historic feature of significant importance.*

No archaeological, historic, topographic, physical, natural, and scenic features will be disturbed with the construction of this use.

- (H) *Whether the proposed special exception will damage existing animal habitat, vegetation, water quality (including groundwater) or air quality.*

The proposed hospital and outpatient medical care facilities are not anticipated to have any adverse impacts on the existing animal habitat, vegetation, water quality, and air quality. Any impacts to wetlands was contemplated and mitigated with the underlying rezoning case.

- (I) *Whether the proposed special exception at the specified location will contribute to or promote the welfare or convenience of the public.*

The proposal promotes public welfare by providing needed healthcare services, new employment opportunities and desired tax revenues to fund important county initiatives, while minimizing consumption of local services.

- (J) *Whether the traffic expected to be generated by the proposed use will be adequately and safely served by roads, pedestrian connections and other transportation services.*

The proposed hospital will generate fewer peak-hour vehicle trips than certain by right uses permitted by ZMAP 2006-0007. Despite this decrease in peak-hour trips, the Applicant is committed to the onsite and off-site road improvements proffered with the zoning case.

- (K) *Whether, in the case of existing structures proposed to be converted to uses requiring a special exception, the structures meet the code requirements of Loudoun County.*

Not applicable to this application.

- (L) *Whether the proposed special exception will be served adequately by essential public facilities and services.*

The hospital and outpatient medical care facilities will be served adequately by existing public utilities and essential public services.

- (M) *The effect of the proposed special exception on groundwater supply.*

No adverse impacts are anticipated on the County's groundwater supply. The hospital and outpatient medical care facilities will be served by public water.

- (N) *Whether the proposed use will affect the structural capacity of the soils.*

No adverse impacts are anticipated on the structural capacity of the soils.

- (O) *Whether the proposed use will negatively impact orderly and safe road development and transportation.*

Route 50 is a principal arterial road designed to accommodate substantial volumes of through and local traffic. As part of ZMAP 2006-0007, westbound Route 50 along the Property's frontage will be widened to three (3) lanes, including a reservation for future construction of an urban-diamond interchange with relocated Gum Spring Road, to accommodate traffic generated by offsite development. Gum Spring Road is planned as a minor collector road used to provide access to developments such as the one proposed here. Also as part of ZMAP 2006-0007, Gum Spring Road will be relocated to the west to line up with existing Stone Springs Boulevard in order to improve vehicle and pedestrian safety and reduce conflicts along Route 50.

- (P) *Whether the proposed special exception use will provide desirable employment and enlarge the tax base by encouraging economic development activities consistent with the Comprehensive Plan.*

The proposed hospital and outpatient medical care facilities will provide desirable employment opportunities and pay much-needed local taxes to support important county initiatives. Therefore, a hospital on this Property will generate an economic benefit to the County.

- (Q) *Whether the proposed special exception considers the needs of agriculture, industry and businesses in future growth.*

The hospital and outpatient medical care facilities address the demand of health care services in the underserved area of the Route 50 corridor.

- (R) *Whether adequate on and off-site infrastructure is available.*

All necessary public utilities are in place and proximate to the Property. Planned off-site road improvements to Route 50, Gum Spring Road, and the Route 50 North Collector Road will adequately serve the hospital and outpatient medical care facilities

- (S) *Any anticipated odors which may be generated by the uses on site, and which may negatively impact adjacent uses.*

The hospital and outpatient medical care facilities are not anticipated to generate odors that would have any adverse impacts on adjacent uses.

(T) *Whether the proposed special exception uses sufficient measure to mitigate the impact of construction traffic on existing neighborhoods and school areas.*

Construction traffic is not anticipated to travel through nearby residential neighborhoods or school areas.

PROPOSED ZONING ORDINANCE MODIFICATIONS

The Applicant is not requesting any new Zoning Ordinance modifications with this application. Several modifications were granted with ZMAP 2006-0007 to facilitate a seamless design of the medical campus on the Property. Those modifications are repeated on the SPEX plat for clarity sake.

313493 v4/RE



MEMORANDUM

TO: Lou Mosurak
Marchant Schneider

CC: Tracey White
Mark Looney
Molly Novotny

FROM: Christopher Tacinelli
Tushar Awar

DATE: January 08, 2010

SUBJECT: StoneSpring Medical Center – Traffic and Trip Generation Assessment

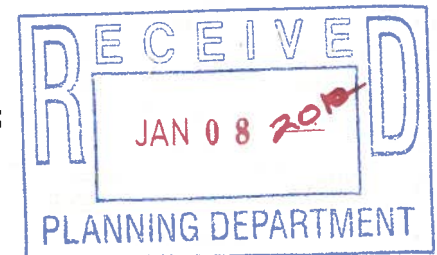
Loudoun County OTS

Loudoun County

HCA Capital Division

Cooley Godward Kronish LLP

Cooley Godward Kronish LLP



INTRODUCTION

The purpose of this memorandum is to summarize a trip generation comparison between the approved and proposed conditions for the proposed StoneSpring Medical Center. The subject site is approximately 24 acres located along the north side of Route 50, west of the existing Gum Spring Road, and east of the future Stone Springs Boulevard (relocated Gum Spring Road), in Loudoun County, Virginia. The application is a Special Exception for hospital use. This use will generate less traffic than an equivalent sized by-right office use contemplated in ZMAP 2006-0007, which established the underlying PD-OP zoning on the Property. The project is anticipated to be complete with full build-out of the development between 2015 and 2020. A regional map showing the location of the site is shown in Figure 1.

At a transportation scoping meeting held in 2007, it was decided that a full traffic study for the special exception would not be necessary if the proposed development plan would generate fewer trips than the development plan proposed with ZMAP 2006-0007, since a traffic study was performed for that rezoning application. Because the proposed special exception development will generate fewer vehicle trips, the results from the original rezoning application represent a worst-case traffic scenario and, therefore, the improvements required by that application will ensure that the roadway network will continue to operate at acceptable levels with the revised development plan. A copy of the agreed upon scope of the study is attached.

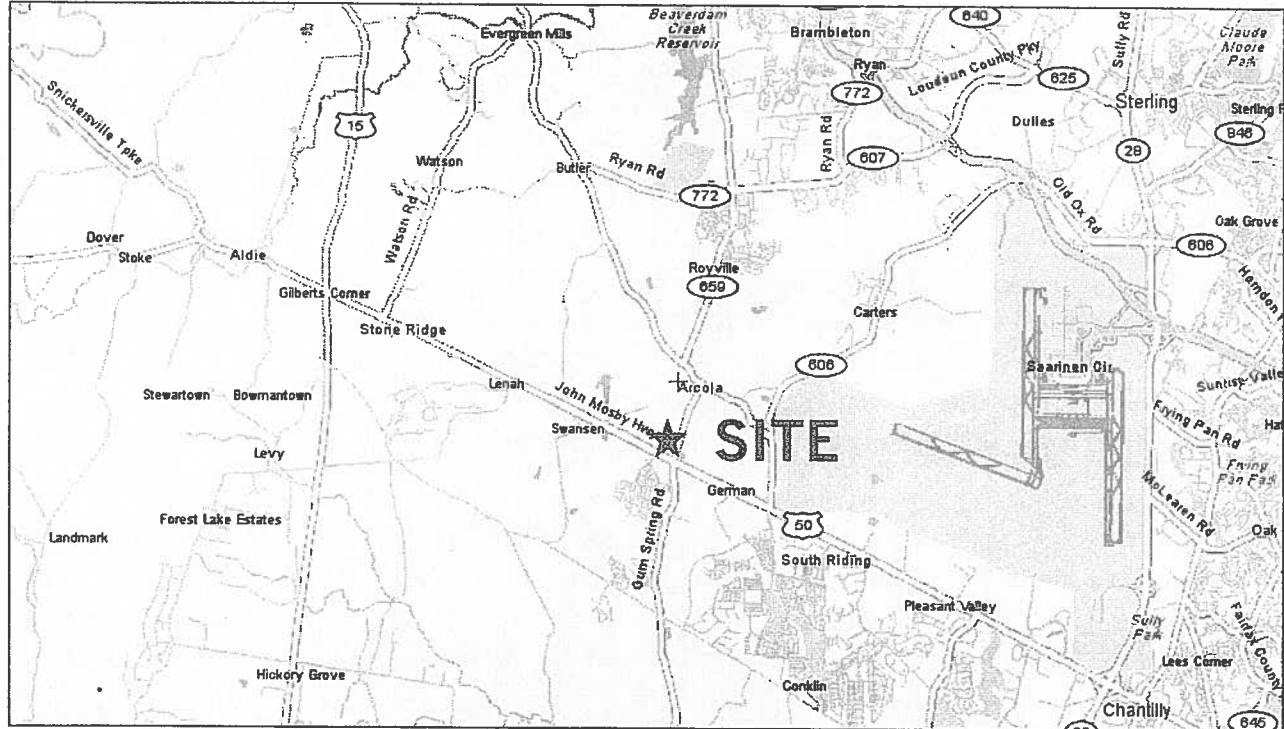
EXISTING CONDITIONS

Existing Roadway Network

Route 50 (John Mosby Highway) is an east-west highway that runs through Northern Virginia. It is generally a four to six lane median-divided minor arterial with variable design speed. In the vicinity of the proposed site, the road is four lanes with wide medians and turning lanes at intersections. The current posted speed limit on this road is 55 mph.

Route 659 (Gum Spring Road) is generally a two lane undivided local access road with variable design speed. In the vicinity of the site, the road is two lanes with 8 to 10-foot travel lanes. The current posted speed limit on this road is 35 mph north of Route 50.

Figure 1: Regional Map and Site Location



Hazardous Locations

A field inspection was conducted of the roadways and intersections in the vicinity of the site. No hazardous conditions were discovered as a result of the field inspection.

CURRENT PLAN

Rezoning application ZMAP 2006-0007 (Glascok Field at Stone Ridge) rezoned the property to PD-OP to allow development of up to 733,036 square feet of general office use. The hospital proposed with this application is approximately 337,000 square feet in its initial phase. Therefore, this memo and the trip generation calculations presented in the subsequent sections analyze the difference in trips between the proposed hospital and an equivalent square footage of approved office development for the site. Table 1 below summarizes the total number of trips that could be generated by the approved office development of 337,000 square feet. All trip generation calculations contained in this memorandum were based on the Institute of Transportation Engineers' (ITE) Trip Generation, 8th Edition.

Table 1: Site Trip Generation for Approved Land Use

Land Use	ITE Code	Size	Units	Week day						
				AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	Total
APPROVED										
General Office Building	710	337	kSF	437	59	496	78	379	457	3,400

PROPOSED DEVELOPMENT CONDITIONS

Future Roadway Network

According to the Loudoun County Countywide Transportation Plan and the Route 50/Arcola CPAM, Route 50 will ultimately be a six-lane limited access median-divided rural arterial, with consideration for bicycle accommodation. Grade-separated interchanges will be constructed at Route 50 and relocated Gum Spring Road as well as at neighboring Route 50 and Route 606.

According to ZMAP 2006-0007, the intersection of Route 50 and Gum Spring Road will become a right-in/right-out access once Stone Springs Boulevard (Gum Spring Road Relocated) is constructed. At that time, existing Gum Spring Road north of proposed Road B may be abandoned. If this happens, the existing southern portion of Route 659 will be rerouted as Road B and "T" into Stone Springs Boulevard.

Access to the site will be provided along Route 50 at the existing Gum Spring Road and the proposed Stone Springs Boulevard (relocated Gum Spring Road). The Gum Spring Road access may be removed once Route 50 becomes limited access.

Proposed Land Use

The current proposed development plan for the StoneSpring Medical Center is to construct a 164-bed hospital. Table 2 below summarizes the total number of trips that could be generated by the hospital.

Table 2: Site Trip Generation for Proposed Land Use

Land Use	ITE Code	Size	Units	Week day						
				AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	Total
SPECIAL EXCEPTION										
Hospital	610	164	Beds	133	54	187	78	137	215	2,951

APPROVED VS. PROPOSED DEVELOPMENT CONDITIONS

Table 3 represents the difference between the current approved development plan and the proposed StoneSpring Medical Center in Loudoun County, Virginia.

Table 3: Approved Condition vs. Proposed Condition

Land Use	ITE Code	Size	Units	Week day						
				AM Peak Hour			PM Peak Hour			Daily
				In	Out	Total	In	Out	Total	Total
APPROVED										
General Office Building	710	337	kSF	437	59	496	78	379	457	3,400
PROPOSED BY SPECIAL EXCEPTION										
Hospital	610	164	Beds	133	54	187	78	137	215	2,951
Difference in Trips (Special Exception Minus Approved)				-304	-5	-309	0	-242	-242	-449
% Difference				-70%	-8%	-62%	0%	-64%	-53%	-13%

As indicated in Table 3, the proposed development plan for the StoneSpring Medical Center will generate less traffic as compared to the currently approved land use. The proposed plan will generate approximately 62% fewer trips than the currently approved land use during the AM peak hour, 53% fewer trips during the PM peak hour, and 13% fewer trips throughout the day.

Table 4: Equivalent Office Development – Compared to the Proposed Medical Center

Land Use	ITE Code	Size	Units	Week day						
				AM Peak Hour			PM Peak Hour			Daily Total
				In	Out	Total	In	Out	Total	
APPROVED										
General Office Building	710	282	kSF	379	51	430	68	327	395	2,964
PROPOSED BY SPECIAL EXCEPTION										
Hospital	610	164	Beds	133	54	187	78	137	215	2,951
Difference in Trips (Special Exception Minus Approved)				-246	3	-243	10	-190	-180	-13
% Difference				-56%	5%	-49%	13%	-50%	-39%	0%

As indicated in Table 4, the proposed development plan for the StoneSpring Medical Center will generate daily trips equivalent to a 282,000 square feet of office development, however on the whole generate significantly less peak hour trips. The proposed plan will generate approximately 49% fewer trips than 282,000 square feet of office during the AM peak hour, 39% fewer trips during the PM peak hour, but an equivalent amount of trips throughout a typical weekday.

CONCLUSION

This memorandum presents the findings of a traffic impact brief for the proposed StoneSpring Medical Center in Loudoun County, Virginia. The analysis presented in this memorandum supports the following major conclusions:

- The proposed development plan will generate fewer trips than the approved development plan, thereby having less of an impact on the surrounding roadway network.
- The proposed hospital will generate approximately **62% fewer trips** during the AM Peak Hour.
- The proposed hospital will generate approximately **53% fewer trips** during the PM Peak Hour.
- The proposed hospital will generate approximately **13% fewer trips** throughout a typical weekday.
- The trips generated daily by the proposed hospital are equivalent to those generated by approximately 282,000 square feet of office use, which is less than what is already approved for the site.
- Access to and from the site will be via two entrances: Route 50 at the proposed Stone Springs Boulevard (relocated Gum Spring Road) and existing Gum Spring Road. The (existing) Gum Spring Road entrance may be removed in the future when Route 50 becomes a limited access highway.

SCOPING DOCUMENT



GOROV E/ SL AD EA SSO CIA TES, INC .

3914 Centreville Road / Suite 330 / Chantilly, VA 20151

Phone: 703-787-8598
Fax: 703-787-9908

MEMORANDUM

TO: George Phillips Loudoun County
CC: Art Smith Loudoun County
Alex Faghri VDOT
John Massey CESP, Inc.
Mark Looney Cooley Godward Kronish, LLP
FROM: Cheryl Sharp
Chris Tacinelli
DATE: May 9, 2007
SUBJECT: Route 50 Medical Campus – Traffic and Trip Generation Assessment Scope

This memorandum outlines the scope for a Traffic and Trip Generation Assessment for the proposed Route 50 Medical Campus. This document is prepared in place of Loudoun County's standard scoping form to document our agreement on the scope of the requested assessment. The application is a Special Exception for a hospital use, and is contingent on the rezoning application ZMAP 2006-0007 (Glasscock Field at Stone Ridge) which requests that the parcel be rezoned to PD-OP. It is understood that this Special Exception application cannot be approved prior to the rezoning application.

Site Location: The subject site is located along the north side of Route 50, west of the existing Gum Spring Road, and east of the future Stone Springs Boulevard (relocated Gum Spring Road), in Loudoun County, Virginia. An area map is included in Figure 1 below.

Site Description: The site being considered for the Special Exception consists of approximately 24 acres currently being rezoned to PD-OP. The application is for a Special Exception in the PD-OP zoning to permit a hospital, an associated helistop, and outpatient medical care facilities. The project is scheduled to be complete with full build-out of the development anticipated between 2015 and 2020.

Trip Generation: In order to calculate the trip generation for the proposed land uses, the Institute of Transportation Engineers (ITE) Trip Generation, 7th Edition publication will be used to determine the trips into and out of the project site. The proposed development will generate approximately 123 trips during the weekday morning peak hour, approximately 141 trips during the weekday afternoon peak hour, and approximately 1,276 trips throughout an entire week day. This is less than a comparably sized office building, resulting in a 44 to 62% lower trip generation, as shown in Table 1 below.

www.getoverlode.com

HCA Development - Traffic Memorandum Scope
May 9, 2007
Page 3

Site Access: Access to the proposed development will be provided via Route 50 at the existing Gum Spring Road and the proposed Stone Springs Boulevard (relocated Gum Spring Road). The detailed assessment will assume that Route 50 will become a limited access highway in the future.

Traffic Counts: As stated previously, the traffic generated by the hospital will be less than the amount of traffic generated by the allowed office use. As was discussed at the scoping meeting, a memorandum summarizing/describing the trips generated by the proposed site, site access, and any particular notable items in the transportation network will address all of the County's Office of Transportation Service's issues for this Special Exception application in lieu of a full traffic study. Traffic counts will not be performed, but field observations of existing conditions will be documented for roads adjacent the site for roadway lane configurations, traffic controls, speed limits, general roadway design characteristics, and surrounding land uses.

Safety issues

MRP

Recommendations: We will not be providing any additional recommendations through this memorandum. As the proposed hospital will be generating fewer trips than the office use allowed in the proposed PD-OP zone, the traffic study currently being performed for ZMAP 2006-0007, showing the recommendations with the office trips, would be a more intense scenario. This Special Exception application is subject to ZMAP 2006-0007 and all its proffers.

Please review the traffic assessment scope described above for the proposed development and sign for agreement and approval to continue with the study.

Loudoun County's Representative Signature/ Date:

James Phillips 5/11/07

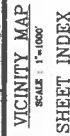
Traffic Consultant's Representative Signature/ Date:

Philip J. Smith 5/09/07

VDOT's Representative Signature/ Date:

STONESPRING MEDICAL CENTER
DULLES ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA

1. THIS APPLICATION IS FOR A SPECIAL EXCEPTION TO PERMIT A HOSPITAL AND AN OUTPATIENT MEDICAL CARE FACILITY, THE SUBJECT PROPERTY IS ZONED PD-OF UNDER ORDINANCE NO. 00-067, THE SUBJEC PROPERTY IS ZONED PD-OF UNDER ORDINANCE NO. 00-067, THE SUBJEC PROPERTY IS ZONED PD-OF UNDER ORDINANCE NO. 00-067.
2. THE PROPERTY SHOWN HEREON IS LOCATED ON LOUDOUN COUNTY TAX MAP 106/108/109/110/111/112/113/114/115/116/117/118/119/120/121/122/123/124/125/126/127/128/129/130/131/132/133/134/135/136/137/138/139/140/141/142/143/144/145/146/147/148/149/150/151/152/153/154/155/156/157/158/159/160/161/162/163/164/165/166/167/168/169/170/171/172/173/174/175/176/177/178/179/180/181/182/183/184/185/186/187/188/189/190/191/192/193/194/195/196/197/198/199/200/201/202/203/204/205/206/207/208/209/210/211/212/213/214/215/216/217/218/219/220/221/222/223/224/225/226/227/228/229/230/231/232/233/234/235/236/237/238/239/240/241/242/243/244/245/246/247/248/249/250/251/252/253/254/255/256/257/258/259/260/261/262/263/264/265/266/267/268/269/270/271/272/273/274/275/276/277/278/279/280/281/282/283/284/285/286/287/288/289/290/291/292/293/294/295/296/297/298/299/300/301/302/303/304/305/306/307/308/309/310/311/312/313/314/315/316/317/318/319/320/321/322/323/324/325/326/327/328/329/330/331/332/333/334/335/336/337/338/339/340/341/342/343/344/345/346/347/348/349/350/351/352/353/354/355/356/357/358/359/360/361/362/363/364/365/366/367/368/369/370/371/372/373/374/375/376/377/378/379/380/381/382/383/384/385/386/387/388/389/390/391/392/393/394/395/396/397/398/399/400/401/402/403/404/405/406/407/408/409/410/411/412/413/414/415/416/417/418/419/420/421/422/423/424/425/426/427/428/429/430/431/432/433/434/435/436/437/438/439/440/441/442/443/444/445/446/447/448/449/450/451/452/453/454/455/456/457/458/459/460/461/462/463/464/465/466/467/468/469/470/471/472/473/474/475/476/477/478/479/480/481/482/483/484/485/486/487/488/489/490/491/492/493/494/495/496/497/498/499/500/501/502/503/504/505/506/507/508/509/510/511/512/513/514/515/516/517/518/519/520/521/522/523/524/525/526/527/528/529/530/531/532/533/534/535/536/537/538/539/540/541/542/543/544/545/546/547/548/549/550/551/552/553/554/555/556/557/558/559/560/561/562/563/564/565/566/567/568/569/570/571/572/573/574/575/576/577/578/579/580/581/582/583/584/585/586/587/588/589/590/591/592/593/594/595/596/597/598/599/600/601/602/603/604/605/606/607/608/609/610/611/612/613/614/615/616/617/618/619/620/621/622/623/624/625/626/627/628/629/630/631/632/633/634/635/636/637/638/639/640/641/642/643/644/645/646/647/648/649/650/651/652/653/654/655/656/657/658/659/660/661/662/663/664/665/666/667/668/669/670/671/672/673/674/675/676/677/678/679/680/681/682/683/684/685/686/687/688/689/690/691/692/693/694/695/696/697/698/699/700/701/702/703/704/705/706/707/708/709/710/711/712/713/714/715/716/717/718/719/720/721/722/723/724/725/726/727/728/729/730/731/732/733/734/735/736/737/738/739/740/741/742/743/744/745/746/747/748/749/750/751/752/753/754/755/756/757/758/759/760/761/762/763/764/765/766/767/768/769/770/771/772/773/774/775/776/777/778/779/780/781/782/783/784/785/786/787/788/789/790/791/792/793/794/795/796/797/798/799/800/801/802/803/804/805/806/807/808/809/810/811/812/813/814/815/816/817/818/819/820/821/822/823/824/825/826/827/828/829/830/831/832/833/834/835/836/837/838/839/840/841/842/843/844/845/846/847/848/849/850/851/852/853/854/855/856/857/858/859/860/861/862/863/864/865/866/867/868/869/870/871/872/873/874/875/876/877/878/879/880/881/882/883/884/885/886/887/888/889/890/891/892/893/894/895/896/897/898/899/900/901/902/903/904/905/906/907/908/909/910/911/912/913/914/915/916/917/918/919/920/921/922/923/924/925/926/927/928/929/930/931/932/933/934/935/936/937/938/939/940/941/942/943/944/945/946/947/948/949/950/951/952/953/954/955/956/957/958/959/960/961/962/963/964/965/966/967/968/969/970/971/972/973/974/975/976/977/978/979/980/981/982/983/984/985/986/987/988/989/990/991/992/993/994/995/996/997/998/999/1000/1001/1002/1003/1004/1005/1006/1007/1008/1009/1010/1011/1012/1013/1014/1015/1016/1017/1018/1019/1020/1021/1022/1023/1024/1025/1026/1027/1028/1029/1030/1031/1032/1033/1034/1035/1036/1037/1038/1039/1040/1041/1042/1043/1044/1045/1046/1047/1048/1049/1050/1051/1052/1053/1054/1055/1056/1057/1058/1059/1060/1061/1062/1063/1064/1065/1066/1067/1068/1069/1070/1071/1072/1073/1074/1075/1076/1



1. COVER SHEET
2. SOILS AND EXISTING CONDITIONS
3. SPECIAL EXCEPTION PLAT
4. SPECIAL EXCEPTION PLAT - 200 SCALE
5. ARCHITECTURAL ILLUSTRATIONS
6. ILLUSTRATIVE LANDSCAPE PLAN
7. ILLUSTRATIVE TRAFFIC PHASING & PEDESTRIAN CIRCULATION PLAN

APPLICANT/OWNER
HIGHWAY 50 REAL ESTATE, LLC.
HCA, INC.
P.O. BOX 1504
NASHVILLE, TN 37202-1504

[illegible]

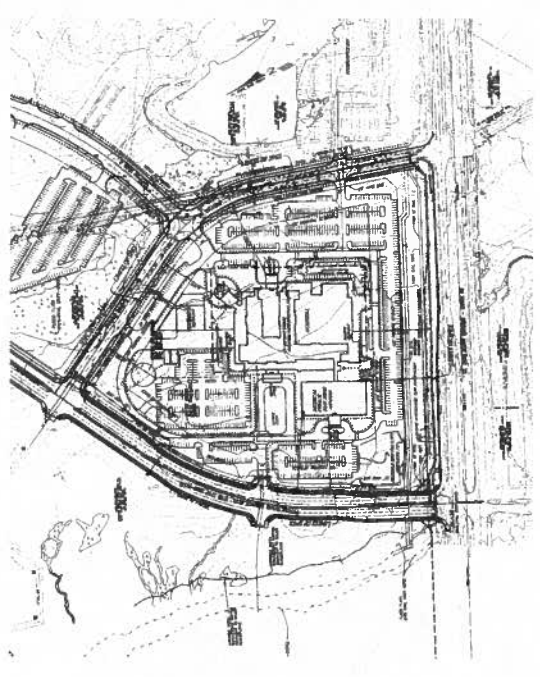
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ZF-12363-1

SHEET
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OF
7

SPECIAL EXCEPTION PLAT - 200 SCALE
STONESPRING MEDICAL CENTER
DULLES ELECTRON DISTRICT
LOUDBON COUNTY, VIRGINIA
CL = N/A
DATE: MARCH 2007

urban
PLANNING
ARCHITECTS
10111
COUNTRY CLUB DRIVE
DULLES, VA 20146
TEL: 703.261.1000
WWW.URBAN-PA.COM

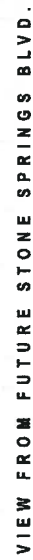
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06-20-07		
07-20-07		
08-20-07		
09-20-07		
10-20-07		
11-20-07		
12-20-07		



LEGEND

- EXISTING TREE LINE
- LIMIT OF SPILL & DISTURBANCE
- PROPOSED STORM SEWER
- EXISTING STORM SEWER
- EXISTING SANITARY
- PROPOSED SANITARY
- EXISTING CONTOUR
- PROPOSED CONTOUR
- PROP. CO-6 CURB AND OUTLET
- HASLE WITH MANAGEMENT BUFFER
- PROPOSED 2' SIDEWALK
- CONTRACT TO CHANGE WITH FINAL ENGINEERING

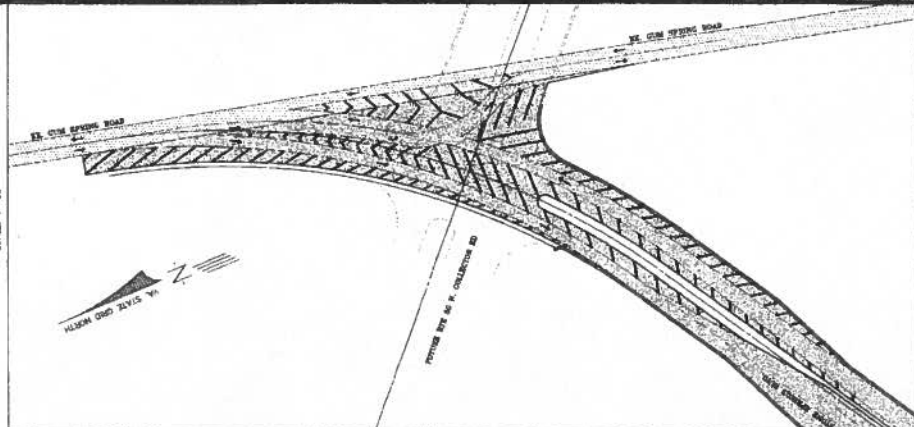
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1 inch = 100 ft



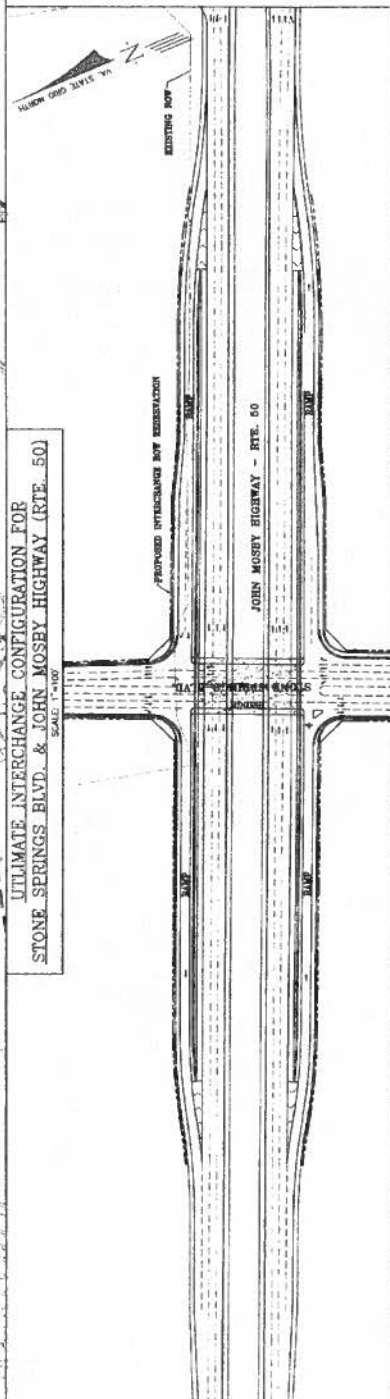
FSA
09058.00

INTERIM INTERSECTION CONDITION FOR
STONE SPRINGS BLVD. & GUM SPRING ROAD

SCALE: 1"=50'



ULTIMATE INTERCHANGE CONFIGURATION FOR
STONE SPRINGS BLVD. & JOHN MOSBY HIGHWAY (RT



FOR ILLUSTRATIVE
PURPOSES ONLY

SHEET 7 OF 7	SHEET 9 OF 11	REF: 1263
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~~GLASCOCK FIELD AT STONE RIDGE
ZMAP 2006-0087 SEX 2007-0037
DUESS ELECTION DISTRICT
LOUDOUN COUNTY, VIRGINIA
CT - 2
DATE: MARCH 2007~~

Urban Engineering & Associates, Inc.
CIVIL ENGINEERS • LANDSCAPE ARCHITECTS • LAND SURVEYORS
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